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7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA – NORTHERN DIVISION**

10 THE CINCINNATI SPECIALTY  
11 UNDERWRITERS INSURANCE COMPANY

CASE NO.: 3:20-cv-00272-MMD-WGC

12 Plaintiff.

13 v.

14 RED ROCK HOUNDS, a Domestic Nonprofit  
Cooperative Corporation Without Stock (81);  
15 LYNN LLOYD, individually; AND TRACY  
TURNBOW (Interested Party)

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF THE  
CINCINNATI SPECIALTY  
UNDERWRITERS INSURANCE  
COMPANY TO FILE AN AMENDED  
COMPLAINT PURSUANT TO COURT  
ORDER (ECF No. 55)**

16 Defendants.

17 RED ROCK HOUNDS, a Domestic Nonprofit  
Cooperative Corporation Without Stock; and  
18 BARBARA LYNN LLOYD,

**[FOURTH REQUEST]**

19 Counterclaimants,

20 v.

21 THE CINCINNATI SPECIALTY  
UNDERWRITERS INSURANCE COMPANY;  
22 BEEHIVE INSURANCE AGENCY, INC., a  
Utah corporation,

23 Counterdefendants.

24 BEEHIVE INSURANCE AGENCY, INC.

25 Third-Party Plaintiffs

26 v.

27 MOORE CLEMENS & CO., INC., a Virginia  
Corporation, and DOES I-X, inclusive

28 Third-Party Defendants.

1 AMERICAN RELIABLE INSURANCE  
2 COMPANY

3 Intervenor

4 Plaintiff/Counterdefendant, THE CINCINNATI SPECIALTY UNDERWRITERS  
5 INSURANCE COMPANY, by and through its attorneys of record, the law firm of LITCHFIELD  
6 CAVO LLP, Defendants/Counterclaimants RED ROCK HOUNDS, by and through its attorneys of  
7 record, the law firm of Maupin Cox & LeGoy, Counterdefendant/Third-Party Plaintiff, BEEHIVE  
8 INSURANCE dba CERTIFIED INSURANCE SERVICES, by and through its attorneys of record, the  
9 law firm of Erickson, Thorpe & Swainston, Ltd., Third-Party Defendant MOORE CLEMENS & CO.,  
10 by and through its attorneys of record, the law firm of Lewis Brisbois Bisgaard & Smith LLP, and  
11 Intervener AMERICAN RELIABLE INSURANCE COMPANY, by and through its attorneys, the law  
12 firm of Resnick & Louis, P.C., Defendant/Interested Party, TRACY TURNBOW, by and through her  
13 attorneys of record, the law firm of Coulter Harsh Law, and BARBARA LYNN LLOYD, by and  
14 through her attorneys of record, the law firm of Alling & Jillson, Ltd., (collectively “Parties”), hereby  
15 jointly stipulate as follows:

16 1. Plaintiff filed this action on May 7, 2020 naming Tracy Turnbow, Red Rock Hounds,  
17 and Lynn Lloyd as Defendants. (ECF No. 1)

18 2. In response to the complaint, Turnbow filed a Motion to Dismiss on July 17, 2021.  
19 (ECF No. 10)

20 3. Red Rock filed a Joinder to Turnbow’s Motion to Dismiss on July 22, 2020. (ECF No.  
21 14).

22 4. The Court issued an Order on January 6, 2021 granting in part and denying in part the  
23 Defendants’ Motion to Dismiss. (ECF No. 55).

24 5. The Order granted Plaintiff leave to file an amended complaint. *Id.*

25 6. The Order granted Plaintiff 15 days, until January 21, 2021, to file its amended  
26 complaint.

27 7. Following the Court’s order granting the Motion to Dismiss, the Parties through  
28 counsel had discussions about extending the time for Plaintiff to file an amended complaint subject to

1 court approval so the parties could save fees and costs and hopefully resolve this matter and the  
2 underlying matter at mediation which is currently scheduled for March 24-25 with Robert B.  
3 Enzenberger.

4       8. Per Stipulation and Order [Third Request] filed April 21, 2021 (ECF No. 73), the  
5 parties requested that Plaintiff have up and until April 30, 2021, to file its amended complaint.

6       9. The parties have further agreed to extend the deadline for Plaintiff to file its Amended  
7 Complaint to May 14, 2021.

8       10. Good cause exists to extend the deadline for Plaintiff to file an amended complaint as  
9 the parties are engaging in productive settlement negotiations but the parties require additional time.

10      11. The parties are acting in good faith in requesting the court approve this stipulation.  
11 This is Plaintiff's fourth request for extension.

12           **IT IS SO STIPULATED.**

13      Dated: April 29, 2021

**LITCHFIELD CAVO LLP**

14      By: /s/ Griffith H. Hayes, Esq.

Griffith H. Hayes, Esq.

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*Attorneys for Plaintiff*

20      Dated: April 29, 2021

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Dated: April 30, 2021

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*Attorneys for Defendant and Interested Party*

Tracy Turnbow

Dated: April 30, 2021

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*Attorneys for Counterdefendant and Third-*

*Party Plaintiff Beehive Insurance Agency*

Dated: April 29, 2021

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*Attorneys for Third-Party Defendant Moore,  
Clemens & Co., Inc.*

Dated: April 30, 2021

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*Attorneys for Intervenor American Reliable  
Insurance Company*

1 Dated: April 29, 2021

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2 By: /s/Richard J. McGuffin, Esq.

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5 Attorneys for Defendant Barbara Lynn Lloyd

6 **ORDER**

7 Pursuant to the parties' stipulation, **IT IS SO ORDERED** that Plaintiff shall have up to and  
8 until May 14, 2021 to file its amended complaint.

9  
10 Dated:

11  
12 **UNITED STATES MAGISTRATE COURT JUDGE**  
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